

**Colorado QNCR List  
3<sup>rd</sup> Quarter of FY2018**

*Repeat SNC appears in bold*

**Black Hawk/ Central City SD WWTF** – Compliance Schedule violation for four consecutive quarters associated with WET testing. What is the update on the effect of the facility's TIE?

**Evans WWTF** – Repeated BOD exceedances. Any evidence on how the new plant is performing this summer?

**Harold D. Thompson Reg'l WWRF** – Schedule violation – Did the June permit modification allow WQCD to manually resolve this violation? *Ellen - was this done?*

**La Junta** – Three consecutive months of potentially dissolved selenium E90s. Now that the discharge-specific variance has come off PN, can these past E90s be manually resolved?

**Leadville Sanitation District** – Schedule violation – Was an NOV issued to address the failure to meet mercury limits?

**Regional WWTF** – Total recoverable arsenic exceedances. Is the outfall relocation project still underway? *Ellen says yes, but still ongoing*

**Rocky Ford WWTF** – Two consecutive quarters of CBOD hits, Mar May 2018. Any recourse by the Division?

**Security Sanitation District WWTF** – Schedule violation. Can this C30 be manually resolved now that a permit modification took effect June 1 to extend the compliance date?

(b)(7)(A)



**Upper Fraser Valley TP** – Schedule violation – Second consecutive quarter of failure to achieve compliance with final discharge limits. WQCD last response stated that corrosion control would be underway based on the CA letter response. What is the next step?

**Windsor WWTF** – Six consecutive months of phosphorus exceedances. Last WQCD update indicated that the City completed an upgrade in October 2017 but that the rolling average phosphorus exceedance would continue for several more quarters.

**Woodmen Hills Metro District WWTF** – Three consecutive months (Apr-Jun 2018) of BOD hits. Has WQCD responded to these exceedances?

**Cherokee Station** – Schedule violations for completing required work and meeting final discharge limits for ammonia. Was the permit renewed with a new compliance schedule and/or limits that can resolve these violations? *Temp. mod. for sched. is adopted by renewed permit for spot-only*

**CDOT** – 2017 stormwater annual report not received. In the last quarterly update, WQCD indicated that the non-standard report form was received but incorrectly processed. Can this violation be manually resolved? *Legitimate N/R*

**Erie North WRF** – Effluent violations. Monthly hits continue to the present. What is the current trajectory for permit reissuance and modification of copper limits?

**Fort Morgan Facility** – Effluent violations. Have the four alternative options for waste treatment been evaluated, and if so what is the chosen alternative?

**London Water Tunnel** – Potentially dissolved zinc remains a SNC problem. Does WQCD still plan to manually resolve these exceedances based on settlement agreement? *Late FY17 info*

*-Parker problem*  
**Swift Beef** – Schedule violation, failure to complete required work by 10/14/2017. The work had not been completed at the time of the last WQCD update. What is the status now?

*Inspected earlier in FY18*

*Kelley - What is your opinion of the SNC rate took in ECHO?*

**CO0020508, Evans WWTF**

- Violation
  - Ongoing BOD effluent violations
- Compliance Advisories
  - Notice of Significant Non-Compliance May 25, 2018
- Facility corrective action measures
  - In the April City Council update Evans states they have completed 94% of the construction of the \$38.4 million consolidation project and anticipate that the equipment testing and startup will be complete by the end of May 2018.
  - Evans has started up the new mechanical plant and is successfully meeting preliminary effluent limits for the facility. Evan will continue to monitor against the PEL limits until a new permit is issued for the facility but is currently reporting on the DMRs for the Hill-N-Park (CO0047287) facility. The new plant was constructed at the Hill-N-Park facility and utilizes the same effluent outfall.
  - The Evans WWTF (CO0020508) is waiting for the lift station construction to be complete. At the time of the site visit (July 24, 2018) the lift station was nearly complete but had run into start up issues with pumps not working. New pumps had been ordered and startup was optimistically anticipated in the next month or two. A call to the engineer for the project requesting an update has been made.
  - Evans also lost the three blowers that were not damaged in the historic 2013 floods but intends to install replacement blowers from the former lagoons at the Hill-N-Park facility in the interim while the lift station issues are addressed and resolved.
- WQCD enforcement response
  - The Division continues to monitor Evans' progress on the consolidation project. Significant improvements have been achieved by completion of the new consolidated treatment plant and. Once the lift station is online and the Evans WWTF is connected to the consolidated plant, discharge will cease from CO0020508.
- Other
  - The Division is currently working on the Permit for the new facility.

**CO0000005, Harold D Thompson Regional WW Reclamation Facility**

- Violation
  - Compliance Schedule: Activities to Meet Total Phosphorus - Commence Required Work or On-Site Construction
- Facility corrective action measures
  - Permit modification took effect on June 1, 2018.



- Compliance schedule now has Complete Required Work or On-Site Construction by September 30, 2018 and Achieve Final Compliance with Discharge Limits by December 31, 2018.
- Substantial completion estimated by October 27, 2018.
- The schedule item was completed late so the violation was not manually resolved.
- (b)(7)(A) [REDACTED]

CO0021261, City of La Junta

- Violation
  - Effluent violations of potentially dissolved Selenium at outfall 003A for January, February, and March 2018.
- Compliance Advisories
  - Notice of Significant Non-Compliance February 16, 2018.
- Facility corrective action measures
  - La Junta received a Discharger Specific Variance for Selenium. The standard from the DSV took effect March 1, 2017.
  - La Junta has applied for a permit modification to incorporate the DSV standard. Once the modification takes effect, the selenium violations will be manually resolved.
  - The modified permit will take effect on September 1, 2018. (b)(7)(A)

(b)(7)(A) [REDACTED]

CO0021164, Leadville Sanitation District

- Violation
  - Compliance Schedule: Activities to Meet Total Mercury Final Limits - Achieve Final Compliance with Emission or Discharge Limits Submit Study Results. Due date June 30, 2017.
- Compliance Advisories
  - August 18, 2017 (response received August 29, 2017)
  - November 22, 2017 (response received December 12, 2017)
- Facility corrective action measures
  - The facility discovered they were not monitoring with the correct method for detecting low-level mercury.
  - After discovering the error it was determined the facility likely would not be able to meet the final mercury limits reliably and consistently without additional investigation and possible improvements to the treatment process and collection system.

- Leadville has determined the likely source of mercury is from ambient levels in the groundwater as there is a long history of mining in the area and the California Gulch superfund site, contaminated with mercury, is nearby.
- Investigations into the integrity of the collection system are in the second phase and Leadville's engineers are formulating a plan to address inflow and infiltration as well as possibly locating other sources of mercury.
- Anticipated return to compliance is unknown at this time.

- (b)(7)(A)

(b)(7)(A)

CO0044458, Regional WWTF (Alamosa)

- Violation
  - Effluent violations for total recoverable Arsenic at outfall 001A for October 2017 through March 2018.
- Compliance Advisories
  - Notice of Significant Violation:
    - December 22, 2017
    - January 19, 2018
    - February 16, 2018
    - March 16, 2018
- Facility corrective action measures
  - Facility applied for a permit modification to allow for completion of the project to relocate the outfall, which will allow the facility to take advantage of a dilution credit that will make it possible for the facility to comply with arsenic limits.
  - During the plans review it was discovered that the outfall would be approximately 300 feet short of entering the Rio Grande River, which is required in order to receive the dilution credit.
  - Alamosa is currently working with Division staff to resolve the outfall location issues.
  - Design has been updated and approved by the Army Corp of Engineers and is in review by the Division. The review should be completed in the next week or so.
  - Anticipated return to compliance date is unknown at this time

*Design approval achieved this week*

- (b)(7)(A)

CO0023850, Rocky Ford WWTF

- Violation
  - Effluent Violations for CBOD in March and May 2018
- Compliance Advisories
  - July 27, 2018
  - May 25, 2018
- Facility corrective action measures
  - Recent data indicates Rocky Ford is back in compliance with the CBOD limitations. (b)(7)(A)
- (b)(7)(A)

CO0024392, Security Sanitation District WWTF

- Violation
  - Compliance Schedule: Commence required Work or On-Site Construction (receive site approval)
- Compliance Advisories
  - December 22, 2017
- Facility corrective action measures
  - Security successfully received a permit modification to extend compliance schedule.
  - Permit modification took effect July 1, 2018.
  - Site location application received June 2018
  - C30 (Schedule Event unachieved but reported) violation will not be resolved because the event remains unachieved. The violation can be resolved once site approval is issued

- (b)(7)(A)

CO0026247, City of Sterling

- Violation
  - Groundwater Compliance Schedule: Activities to Meet T.I.N. Final Limits
- Compliance Advisories
  - April 21, 2017
- Facility corrective action measures
  - Sterling continues to work with the Division on identifying the solution to meeting permit effluent limitations.

*They should leave open the compl. schedule for intent to SLO b/c*

- o Sterling ceased discharging to the groundwater basins on November 1, 2017, and there is not T.I.N. monitoring requirement for the surface water discharge.
- o Anticipated return to compliance is unknown at this time.

(b)(7)(A)

#### CO0040142, Upper Fraser Valley TP

- Violation
  - o Compliance Schedule: Activities to Meet Total Dissolved Copper - Achieve Final Compliance with Emission or Discharge Limits Submit Study Results Showing Compliance Attained; due April 30, 2017.
- Compliance Advisories
  - o February 16, 2018
- Facility corrective action measures
  - o Fraser received approval for their Site Location Amendment from the Division on August 14, 2018.
  - o Fraser is installing metals and phosphorus removal treatment modifications
  - o Anticipated return to compliance is unknown at this time.
  - o Fraser requested a Major Modification to the Permit to include monthly copper limitations. The modification was approved and became effective on January 1, 2017. Fraser has had success meeting permit limitations with the monthly copper limits. The completion of the metals and phosphorus removal treatment modifications will provide a greater degree of confidence the facility will be able to meet the copper limitations reliably and consistently.
- WQCD enforcement response
  - o The Division will continue working with the facility regarding the unique challenges faced by a resort town with three separate drinking water facilities feeding into the wastewater treatment facility, and copper limits.
  - o The Division will continue to monitor compliance with the effluent copper limitations and will close the compliance schedule and resolve any eligible

*rolling limits* **yes**



violations related to the compliance schedule when treatment modifications are completed.

CO0047091, Woodmen Hills Metro District WWTF

- Violation
  - Ongoing BOD effluent violations
- Compliance Advisories
  - Notice of Non-Compliance May 25, 2018
- Facility corrective action measures
  - Woodmen Hills continues construction on new mechanical plant to meet permit limits at the facility. Completion was anticipated October 31, 2018 but Woodmen Hills recently requested an extension to the completion date for the loss of a subcontractor and construction delays.

*Comp. Settlement Agreement 2015  
Nov in 2009*

- (b)(7)(A) [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
- [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]

CO0020320, Town of Windsor

- Violation
  - Total Phosphorus effluent exceedances August 2017 through March 2018
- Compliance Advisories
  - December 22, 2017
  - February 16, 2017
  - March 16, 2017
  - May 25, 2018
- Facility corrective action measures
  - The Town has completed improvements to meet phosphorus limits, which was the addition of an anaerobic zone for biological phosphorus removal. This was achieved by installing a curtain wall and floating mixers to the aeration basins. After several months of analysis and evaluation it was determined that chemical phosphorus removal would be necessary to achieve permit compliance.



- The construction was completed on October 20, 2017 and chemical feed began on October 25, 2017.
- The facility has achieved effluent phosphorus results under the permit limit of 1.0 mg/L but the annual rolling average will require additional time to return to compliance. The facility does not anticipate any additional monthly limit exceedances and should return to compliance in the next month or two.
- WQCD enforcement response
  - The Division intends to monitor monthly results to ensure compliance with the limit is being met and will escalate as needed should future non-compliance occur.

#### CO0048445, Erie North Water Reclamation Facility

- Violation
  - Ongoing effluent exceedances of potentially dissolved copper 2-year rolling average
- Compliance Advisories
  - Compliance advisories have not been sent as a result of the facility consistently submitting a cover letter with an explanation/update regarding the exceedance of the 2-year rolling average for copper.
- Facility corrective action measures
  - Erie is currently working on an expansion project and has received updated Preliminary Effluent Limits which eliminate the 2-year rolling average for copper.
  - Erie has also contacted a consultant to work on a corrosion control study in a continuing effort to minimize the amount of copper entering the facility through the drinking water system.
  - As a result of the corrosion control study the facility states it is effectively controlling pH in the Distribution system to help limit the influent copper to the wastewater facility.

• (b)(7)(A)

A large black rectangular redaction box covers the majority of the text in this section, starting from the bullet point (b)(7)(A) and extending down to the section header for CO0001104.

#### CO0001104, Cherokee Station (Xcel Energy)

- Violation
  - Compliance schedule violations in October 2017
- Compliance Advisories
  - None sent due permit appeal
- Facility corrective action measures
  - None due permit appeal

(b)(7)(A)

- Other
  - NA

**CO0027707, Swift-Beef Lone Tree**

*Air scrubber arrived broken,  
awaiting repairs.*

- Violation
  - Compliance schedule violation in October 2017
- Compliance Advisories
  - Compliance advisory sent 12/22/17.
- Facility corrective action measures
  - JBS previously installed a brine evaporator but was unable to run at full capacity due to air issues. A full size air scrubber has been installed recently but still working out some electrical issues. The Q2 WET results have not been provided by the lab (AquaTox) so have yet to determine the effectiveness of the evaporator at full capacity. AquaTox created problems for multiple permittees as they were evidently "off line" for a number of weeks and unresponsive to all applicable permittees. JBS looking at new lab.
- (b)(7)(A)

**Fort Morgan Facility** – Effluent violations. Have the four alternative options for waste treatment been evaluated, and if so what is the chosen alternative? Michael- we can discuss

**London Water Tunnel** – Potentially dissolved zinc remains a SNC problem. Does WQCD still plan to manually resolve these exceedances based on settlement agreement? Yes

*Manual resolution to happen  
soon.*

**CDOT**- this was a delinquent DMR. Not received. No further action planned.